

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF GENERAL COUNSEL

In the Matter of)
)
The Use of N11 Codes and Other) CC Docket No. 92-105
Abbreviated Dialing Arrangements)

Comments of Ameritech to
Further Notice Of Proposed Rulemaking

Ameritech files its Comments in response to the Commission's Further Notice of Proposed Rulemaking ("FNPRM") released on February 19, 1997, in conjunction with the Commission's First Report and Order (First Report and Order") in this matter. In its First Report and Order, the Commission concluded that "an N11 code, specifically 711, should be assigned for TRS use." However, the Commission found that "certain issues related to technical and operational capability, cost, and competition, must be resolved before a nationwide N11 code for TRS access can be implemented."¹ The Commission also tentatively concluded that 711 access to TRS should occur "within three years" of the effective date of the First Report and Order.² Ameritech supports setting aside 711 for TRS access

¹ First Report and Order ¶¶55 and 67.

² Id.

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while technical, operational, capacity, cost and competition issues are being resolved.

In the FNPRM, the Commission asks the parties to address several questions regarding implementation of 711 access to TRS.³ In its Comments, Ameritech will answer the Commission's questions and show that the use of 711 to provide access to TRS is generally technically and economically feasible, but that a final determination depends on the nature and extent of the access the Commission ultimately requires. The same is also true regarding the three year time frame being considered for implementing 711 access to TRS. However, in order to determine if 711 access is technically feasible and the time frame required for implementation, it is imperative that the Commission resolve the final requirements and parameters of the service.

An example of a factor that may impact the implementation of 711 access is the number of providers that 711 may be used to access. Access through 711 to the local authorized TRS provider appears feasible for implementation within three years at a reasonable cost, but access to multiple TRS providers using the same code does not. Use of 711 to provide access to multiple TRS providers will also likely pose technical issues, cause significant added costs and delay implementation of the service. It may also

³ Id. ¶67-68.

degrade the quality of access to TRS. Moreover, use of 711 to provide access to multiple TRS providers is not the best method of fostering competition and consumer choice.

Ameritech agrees with the Commission that administration of N11 codes should be performed by a neutral third party. However, Ameritech believes that administration of these codes should remain with the party administering central office codes in an area, and proposes that administration of N11 codes be transferred to the NANP administrator at the same time that local central office code administration is transferred.

I. PROVIDING 711 ACCESS TO A SINGLE TRS PROVIDER IS TECHNICALLY AND ECONOMICALLY FEASIBLE.

Based upon Ameritech's preliminary analysis and the limited information provided in the Commission's FNRM, it appears that use of 711 to provide access to one TRS provider in each state is technically feasible, and can be implemented at a reasonable cost. However, additional information is required concerning the final requirements and parameters for 711 access before Ameritech can fully analyze either the technical feasibility or cost of 711 to access TRS.

For example, the Commission asks parties to address potential use of 711 by users to access the provider of their choice through some presubscription or database inquiry. As will be demonstrated, a

requirement that customers be able to select a preferred TRS provider for 711 access, depending on the nature and scope of the requirement, may raise significant technical issues and cause a significant increase in the cost of implementing and providing the service.

In order to enable the commenters to provide a meaningful analysis of technical feasibility and costs, Ameritech recommends that the Commission first specifically define the requirements and parameters of TRS 711 access it is considering, and then permit the parties to address the technical feasibility and cost of providing it.

II. THREE YEARS APPEARS TO BE A REASONABLE PERIOD TO IMPLEMENT 711 ACCESS TO A SINGLE PROVIDER.

The Commission tentatively concludes that three years is a reasonable time for nationwide implementation of 711 access to TRS.⁴ If the Commission determines that 711 will be used to provide access to a single TRS provider in each state, Ameritech agrees that three years is a reasonable time for it to implement that form of access.

However, Ameritech's estimate that it can complete implementation of 711 access to TRS within three years is based upon use of 711 to provide access to a single TRS provider in each state, which for the most part can be implemented without the need to develop new arrangements or software, to deploy a significant amount of new equipment, or to make major network

⁴ Id. ¶68.

reconfigurations. Basically, implementation of 711 access to one provider in each state will require the entry into each switch of the translations necessary to route 711 calls to the appropriate TRS provider.

However, if the Commission requires the implementation of a form of 711 access that requires the development of new technology or software, or the deployment of new equipment or significant network reconfigurations, then industry may not reasonably be able to meet a three-year time frame. An example is a requirement that customers be able to presubscribe to a TRS provider of their choice, or that they receive access to the provider of their choice regardless of where they dial 711. The specific time frame required would depend on the exact form of multiple provider access required and the scope of the developmental and network modification work required to implement it.

Since no carrier can begin to implement 711 access until it knows the nature of the access it is required to provide, the deadline for implementation should be measured from the date the Commission issues its final requirements and parameters for 711 access in this FNPRM, and not the date of the First Report and Order.

III. USE OF 711 AS A GATEWAY TO MULTIPLE PROVIDERS IS NOT REQUIRED FOR COMPETITION, MAY POSE TECHNICAL PROBLEMS, MAY DEGRADE SERVICE, IS ECONOMICALLY INFEASIBLE, AND WILL DELAY THE IMPLEMENTATION.

Ameritech does not yet know the details of any proposal for use of 711 to provide access to multiple providers⁵ and, therefore, cannot analyze the technical and economic feasibility of using 711 as gateway to multiple providers. However, it is clear that any such arrangement will raise significant technical issues, and will greatly inflate the costs of implementing 711 access, in all likelihood far beyond any benefit derived from that arrangement. No matter how multiple carrier access is deployed, it would require the development of new capabilities, the deployment of which will require significant amounts of new equipment, software and/or major network reconfigurations. Ameritech believes that the cost and time delay impacts of these factors should be weighed against any benefit of multiple-provider 711 access before any proposal is mandated by the Commission.

Moreover, use of 711 as a multi-provider gateway may degrade the quality of access to TRS. For example, as 800 portability demonstrates, implementation of a TRS gateway could create post dial delay that could

⁵ For instance a limited requirement that TRS users have the ability to presubscribe their home number to a provider of their choice may be feasible using existing AIN capabilities and therefore may pose fewer technical, operational and costs issues than a requirement that all lines be presubscribed, or that users be able to choose their own provider regardless of where they dial 711.

imperil the industry's ability to meet the Commission's service objective that 85% of TRS calls are answered within 10 seconds.⁶

Equally as important, there are other ways to foster TRS competition and consumer choice, other than multiple provider 711 access, that do not raise significant technical, cost and quality concerns. For example, many states have implemented competitive bidding for state certified TRS providers.⁷

Moreover, the Industry Numbering Committee ("INC") has already permitted each national TRS provider to select a number that it can universally use throughout the NANP serving area. Thus, end users that wish to use a single provider wherever they are in the NANP serving area, or to use a provider other than the local certified provider in their local area, need simply remember the single number of that provider. This would hold true even after 711 access is implemented, and would provide a viable competitive option to the local state certified provider. This is particularly true today, since the number can be programmed into customer provided equipment ("CPE").

⁶ Id. See, also 47 C.F.R. §64.604(b)(2).

⁷ For example, the Public Utilities Commission of Ohio ("PUCO") originally awarded the contract to be the state-certified TRS Provider in Ohio through a competitive bidding process that Ameritech won. Recently the PUCO issued a Request for Proposal ("RFP") for parties to bid for a new contract to be the state-certified TRS provider in Ohio.

IV. PROVIDING BOTH VOICE AND TEXT SERVICES THROUGH 711 APPEARS TO BE FEASIBLE.

The Commission asks if access to both voice and text TRS could be provided via 711.⁸ Ameritech currently provides both voice and text service in Michigan and Ohio, and is aware of no technical reason why access to both voice and text TRS through 711 is infeasible.

V. ADMINISTRATION OF N11 CODES SHOULD BE TRANSFERRED TO THE NEUTRAL CENTRAL OFFICE CODE ADMINISTRATOR.

The Commission proposes that administration of N11 codes be transferred to the NANP administrator.⁹ Ameritech agrees that in a competitive marketplace, N11 code administration is best performed by a neutral third-party. However, it also makes sense that the administration of all local numbers (central office codes and N11 codes) remain together and, therefore, Ameritech proposes that N11 code administration be transferred in each area to the NANP administrator at the same time that the administration of central office codes is transferred.

VI. CONCLUSION

For the above reasons, Ameritech proposes that the Commission (1) find that 711 should be used to provide access to the state-certified TRS provider in each state, (2) hold that 711 access should be implemented

⁸ First Report and Order ¶68.

⁹ Id. ¶75.

within three years of the Commission's ruling in this FNPRM requiring access to a single TRS provider in each state, (3) ask the parties to address technical feasibility and cost issues based upon a specific proposal or alternate proposals developed in this FNPRM, and (4) require transfer of the N11 code administration to the third-party administration in each state at the same time that central office code administration is transferred to that party.

A handwritten signature in cursive script, reading "Larry A. Peck".

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